

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TRACIE D. MORGAN,

Plaintiff,

vs.

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY,

Defendant.

NO.

COMPLAINT FOR LONG TERM  
DISABILITY BENEFITS

COMES NOW plaintiff, Tracie D. Morgan, with a complaint for Long-Term Disability benefits and states and alleges as follows:

I. IDENTIFICATION OF PLAINTIFF

1.1 At all times material herein, plaintiff was a resident of Pierce County, Washington, and was a beneficiary, participant and insured under a Long Term Disability plan covered by the Employee Retirement Income Security Act of 1974 (ERISA).

II. IDENTIFICATION OF DEFENDANTS

2.1. At all times material herein, defendant, Hartford Life and Accident Insurance Company, administered an employee welfare plan governed by ERISA. The plan is known as the PACCAR Inc Group Disability Income Insurance Plan. Defendant, Hartford Life and Accident Insurance Company, administered the Plan, made adverse benefit determinations, and is a Plan Administrator under ERISA. Benefits under the PACCAR

1 Inc Group Disability Income Insurance Plan are funded through an insurance policy  
2 (Group Policy No. 83123837) issued by defendant which designates plaintiff's employer,  
3 PACCAR Inc., as policyholder.

4 III. FACTS

5 3.1 Plaintiff made application for Long-Term Disability benefits with defendant. On  
6 February 24, 2016, defendant denied plaintiff's application for Long Term Disability  
7 benefits.

8 3.2 Plaintiff has exhausted all administrative remedies.

9 IV. CAUSE OF ACTION

10 4.1 Plaintiff brings this action under 29 U.S.C. § 1132(a)(1)(B) to recover Long-Term  
11 Disability benefits under an employer sponsored welfare plan.

12 V. RELIEF REQUESTED

13 5.1 Plaintiff requests that this Court order entitlement to Long-Term Disability benefits with  
14 payment of benefits that have accrued, reinstatement to the Plan, award of attorney fees  
15 and costs, and any other relief the court deems just and equitable in the premises.

16 5.2 Plaintiff requests that this court require defendants to answer this complaint and supply  
17 the court with copies of the administrative record, the Summary Plan Description, and the  
18 applicable insurance policy.

19 DATED this 9<sup>th</sup> day of March, 2016.

20 TODD R. RENDA, ATTORNEY AT LAW

21 /s/ Todd R. Renda

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